

**BEFORE THE
BOARD OF PSYCHOLOGY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Statement of Issues Against:

SIMON ANDREW CASEY
250 La Rambla
San Clemente, CA 92672

Respondent.

Case No. X47

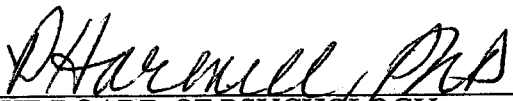
OAH No. L-2002030437

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Psychology, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on May 10, 2003.

It is so ORDERED April 10, 2003.



FOR THE BOARD OF PSYCHOLOGY
DEPARTMENT OF CONSUMER AFFAIRS
PAMELA HARMELL, Ph.D., PRESIDENT

1 BILL LOCKYER, Attorney General
of the State of California
2 E. A. JONES III, State Bar No. 71375
Deputy Attorney General
3 California Department of Justice
300 So. Spring Street, Suite 1702
4 Los Angeles, CA 90013
Telephone: (213) 897-2543
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6 Attorneys for Complainant

7 **BEFORE THE**
8 **BOARD OF PSYCHOLOGY**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Statement of Issues Against:

11 SIMON ANDREW CASEY
250 La Rambla
12 San Clemente, CA 92672

13 Respondent.
14

Case No. X47

OAH No. L-2002030437

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15
16 In the interest of a prompt and speedy settlement of this matter, consistent with the
17 public interest and the responsibility of the Board of Psychology of the Department of Consumer
18 Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order
19 which will be submitted to the Board for approval and adoption as the final disposition of the
20 Statement of Issues.

21 **PARTIES**

22 1. Thomas S. O'Connor (Complainant) is the Executive Officer of the Board
23 of Psychology. He brought this action solely in his official capacity and is represented in this
24 matter by Bill Lockyer, Attorney General of the State of California, by E. A. Jones III, Deputy
25 Attorney General.

26 2. Respondent Simon Andrew Casey (Respondent) is represented in this
27 proceeding by attorney Allan H. Stokke, whose address is Stokke & Riddet, 3 Imperial
28 Promenade, Suite 750, Santa Ana, CA 92707.

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1 will be stayed and the Respondent placed on three (3) years probation on the following terms and
2 conditions.

3 1. PSYCHOLOGICAL EVALUATION Within 90 days of the effective date
4 of this Decision and on a periodic basis thereafter as may be required by the Board or its
5 designee, respondent shall undergo a psychological evaluation (and psychological testing, if
6 deemed necessary) by a Board-appointed California-licensed psychologist. Respondent may not
7 practice psychology pursuant to his license until he successfully completes the psychological
8 evaluation and the Board concludes from the results of the evaluation that respondent's ability to
9 practice psychology is not impaired due to mental illness. Respondent shall sign a release which
10 authorizes the evaluator to furnish the Board a current DSM IV diagnosis and a written report
11 regarding the respondent's judgment and/or ability to function independently as a psychologist
12 with safety to the public, and whatever other information the Board deems relevant to the case.
13 The completed evaluation is the sole property of the Board.

14 If the Board concludes from the results of the evaluation that respondent's ability
15 to practice psychology safely is impaired due to mental illness, respondent shall not practice
16 psychology pursuant to his license until a the Board concludes from the recommendation of a
17 board-appointed evaluator that respondent is safe to practice. During this suspension period,
18 probation will be tolled and will not apply to the reduction of this probation period.

19 If ongoing psychotherapy is recommended in the psychological evaluation, the
20 Board will notify respondent in writing to submit to such therapy and to select a psychotherapist
21 for approval by the Board or its designee within 30 days of such notification. The therapist shall
22 1) be a California-licensed psychologist with a clear and current license; 2) have no previous
23 business, professional, personal or other relationship with respondent; 3) not be the same person
24 as respondent's practice monitor, if any. Frequency of psychotherapy shall be determined upon
25 recommendation of the treating psychotherapist with approval by the Board or its designee;
26 however, psychotherapy shall, at a minimum, consist of one one-hour session per week.
27 Respondent shall continue psychotherapy until released by the approved psychologist and
28 approved by the Board or its designee. The Board or its designee may order a re-evaluation upon

1 receipt of the therapist's recommendation.

2 Respondent shall execute a release authorizing the therapist to provide to the
3 Board any information the Board or its designee deems appropriate, including quarterly reports of
4 respondent's therapeutic progress. Respondent shall furnish a copy of this Decision to the
5 therapist. If the therapist believes the respondent cannot continue to independently render
6 psychological services, with safety to the public, he/she shall notify the Board immediately.

7 Respondent shall pay all costs associated with the psychological evaluation and
8 ongoing psychotherapy. Failure to pay costs will be considered a violation of the probation
9 order.

10 2. EDUCATION REVIEW Respondent shall submit to an educational
11 review concerning the circumstances which resulted in this administrative action. The
12 educational review shall be conducted by a board-appointed expert case reviewer and/or Board
13 designee familiar with this case. Educational reviews are informational only and intended to
14 benefit Respondent's practice by preventing future such complaints. Respondent shall pay all
15 costs associated with this educational review.

16 3. COMMUNITY SERVICE - FREE SERVICES Within 60 days of the
17 effective date of this decision, respondent shall submit to the Board or its designee for its prior
18 approval a community service program in which respondent shall provide free psychological
19 services, if approved supervision is obtained, or free non-psychological services if supervision is
20 not available, on a regular basis to community, charitable facility, governmental entity or a
21 nonprofit corporation tax exempt under the Internal Revenue Code for at least 8 hours a month
22 for the first 12 months of probation.

23 4. ETHICS COURSE Within 90 days of the effective date of this Decision,
24 respondent shall submit to the Board or its designee for prior approval a course in laws and ethics
25 as they relate to the practice of psychology. Said course must be successfully completed at an
26 accredited educational institution or through a provider approved by the Board's accreditation
27 agency for continuing education credit. Said course must be taken and completed within one
28 year from the effective date of this Decision. The cost associated with the law and ethics course

1 shall be paid by the respondent.

2 5. PROBATION COSTS Respondent shall pay the costs associated with
3 probation monitoring each and every year of probation. Such costs shall be payable to the Board
4 of Psychology at the end of each fiscal year (July 1 - June 30). Failure to pay such costs shall be
5 considered a violation of probation.

6 The filing of bankruptcy by respondent shall not relieve respondent of the
7 responsibility to repay probation monitoring costs.

8 6. OBEY ALL LAWS Respondent shall obey all federal, state, and local
9 laws and all regulations governing the practice of psychology in California including the ethical
10 guidelines of the American Psychological Association. A full and detailed account of any and all
11 violations of law shall be reported by the respondent to the Board or its designee in writing
12 within seventy-two (72) hours of occurrence.

13 7. QUARTERLY REPORTS Respondent shall submit quarterly
14 declarations under penalty of perjury on forms provided by the Board or its designee, stating
15 whether there has been compliance with all the conditions of probation.

16 8. PROBATION COMPLIANCE Respondent shall comply with the Board's
17 probation program and shall, upon reasonable notice, report to the assigned District Office of the
18 Medical Board of California or other designated probation monitor. Respondent shall contact the
19 assigned probation officer regarding any questions specific to the probation order. Respondent
20 shall not have any unsolicited or unapproved contact with 1) complainants associated with the
21 case; 2) Board members or members of its staff; or 3) persons serving the Board as expert
22 evaluators.

23 9. INTERVIEW WITH BOARD OR ITS DESIGNEE Respondent shall
24 appear in person for interviews with the Board or its designee upon request at various intervals
25 and with reasonable notice.

26 10. CHANGES OF EMPLOYMENT Respondent shall notify the Board in
27 writing, through the assigned probation officer, of any and all changes of employment, location,
28 and address within 30 days of such change.

1 11. TOLLING FOR OUT-OF-STATE PRACTICE, RESIDENCE OR IN-
2 STATE NON-PRACTICE In the event respondent should leave California to reside or to
3 practice outside the State or for any reason should respondent stop practicing psychology in
4 California, respondent shall notify the Board or its designee in writing within ten days of the
5 dates of departure and return or the dates of non-practice within California. Non-practice is
6 defined as any period of time exceeding thirty days in which respondent is not engaging in any
7 activities defined in Sections 2902 and 2903 of the Business and Professions Code. Periods of
8 temporary or permanent residency or practice outside California or of non-practice within
9 California will not apply to the reduction of this probationary period, although the Board may
10 allow respondent to complete certain terms of probation that are not associated with active
11 practice.

12 12. EMPLOYMENT AND SUPERVISION OF TRAINEES If respondent is
13 licensed as a psychologist, he shall not employ or supervise or apply to employ or supervise
14 psychological assistants, interns or trainees during the course of this probation. Any such
15 supervisory relationship in existence on the effective date of this probation shall be terminated
16 by respondent and/or the Board.

17 13. FUTURE REGISTRATION OR LICENSURE If respondent is currently
18 registered as a psychological assistant and subsequently obtains other psychological assistant
19 registrations or becomes licensed as a psychologist during the course of this probationary order,
20 respondent agrees that this Decision shall remain in full force and effect until the probationary
21 period is successfully terminated. Future registration or licensure shall not be approved,
22 however, until respondent is currently in compliance with all of the terms and conditions of
23 probation.

24 14. VIOLATION OF PROBATION If respondent violates probation in any
25 respect, the Board may, after giving respondent notice and the opportunity to be heard, revoke
26 probation and carry out the disciplinary order that was stayed. If an Accusation or Petition to
27 Revoke Probation is filed against respondent during probation, the Board shall have continuing
28 jurisdiction until the matter is final, and the period of probation shall be extended until the matter

1 is final. No Petition for Modification or Termination of Probation shall be considered while
2 there is an Accusation or Petition to Revoke Probation pending against respondent.

3 15. COMPLETION OF PROBATION Upon successful completion of
4 probation, respondent's license shall be fully restored.

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7 ACCEPTANCE

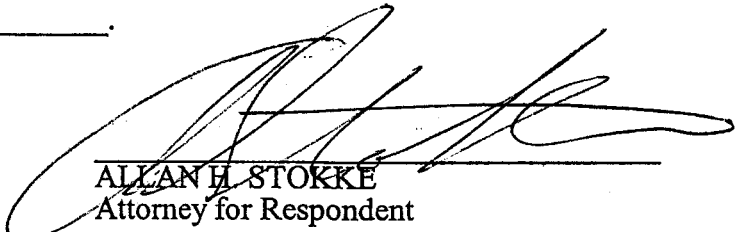
8 I have carefully read the above Stipulated Settlement and Disciplinary Order and
9 have fully discussed it with my attorney, Allan H. Stokke. I understand the stipulation and the
10 effect it will have on my application for licensure as a registered psychological assistant. I enter
11 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,
12 and agree to be bound by the Decision and Order of the Board of Psychology.

13 DATED: 2-28-03.

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15 
16 SIMON ANDREW CASEY
17 Respondent

18 I have read and fully discussed with Respondent Simon Andrew Casey the terms
19 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
20 Order. I approve its form and content.

21 DATED: 2-28-03.

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23 
24 ALLAN H. STOKKE
25 Attorney for Respondent

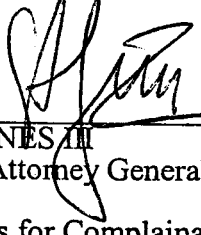
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27 ENDORSEMENT

28 The foregoing Stipulated Settlement and Disciplinary Order is hereby

1 respectfully submitted for consideration by the Board of Psychology of the Department of
2 Consumer Affairs.

3
4 DATED: 3/6/03

5 BILL LOCKYER, Attorney General
6 of the State of California

7 
8 E. A. JONES III
9 Deputy Attorney General

10 Attorneys for Complainant

11 DOJ Docket Number: 03598160-LA2002AD0120
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Exhibit A
Statement of Issues No. X47

BILL LOCKYER, Attorney General
of the State of California
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California Department of Justice
300 So. Spring Street, Suite 1702
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Attorneys for Complainant

**BEFORE THE
BOARD OF PSYCHOLOGY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Statement of Issues Against:

Case No. X47

SIMON ANDREW CASEY,
250 La Rambla
San Clemente, CA 92672

STATEMENT OF ISSUES

Respondent.

Complainant alleges:

PARTIES

1. Thomas S. O'Connor (Complainant) brings this Statement of Issues solely in his official capacity as the Executive Officer of the Board of Psychology, Department of Consumer Affairs.

2. On or about August 12, 2001, Simon Andrew Casey (Respondent) submitted an application for a license as a registered psychological assistant to the Board of Psychology. The application was denied on or about November 20, 2001.

JURISDICTION

3. This Statement of Issues is brought before the Board of Psychology (Board), under the authority of the following sections of the Business and Professions Code (Code).

4. Section 2960 of the Code states:

1 The board may refuse to issue any registration or license, or may issue a
2 registration or license with terms and conditions, or may suspend or revoke the
3 registration or license of any registrant or licensee if the applicant, registrant, or licensee
4 has been guilty of unprofessional conduct. Unprofessional conduct shall include, but not
5 be limited to:

6 (a) Conviction of a crime substantially related to the qualifications, functions or
7 duties of a psychologist or psychological assistant.

8 (b) Use of any controlled substance as defined in Division 10 (commencing with
9 Section 11000) of the Health and Safety Code, or dangerous drug, or any alcoholic
10 beverage to an extent or in a manner dangerous to himself or herself, any other person, or
11 the public, or to an extent that this use impairs his or her ability to perform the work of a
12 psychologist with safety to the public.

13 (c) Fraudulently or neglectfully misrepresenting the type or status of license or
14 registration actually held.

15 (d) Impersonating another person holding a psychology license or allowing
16 another person to use his or her license or registration.

17 (e) Using fraud or deception in applying for a license or registration or in passing
18 the examination provided for in this chapter.

19 (f) Paying, or offering to pay, accepting, or soliciting any consideration,
20 compensation, or remuneration, whether monetary or otherwise, for the referral of clients.

21 (g) Violating Section 17500.

22 (h) Willful, unauthorized communication of information received in professional
23 confidence.

24 (i) Violating any rule of professional conduct promulgated by the board and set
25 forth in regulations duly adopted under this chapter.

26 (j) Being grossly negligent in the practice of his or her profession.

27 (k) Violating any of the provisions of this chapter or regulations duly adopted
28 thereunder.

1 (l) The aiding or abetting of any person to engage in the unlawful practice of
2 psychology.

3 (m) The suspension, revocation or imposition of probationary conditions by
4 another state or country of a license or certificate to practice psychology or as a
5 psychological assistant issued by that state or country to a person also holding a license or
6 registration issued under this chapter if the act for which the disciplinary action was taken
7 constitutes a violation of this section.

8 (n) The commission of any dishonest, corrupt, or fraudulent act.

9 (o) Any act of sexual abuse, or sexual relations with a patient or former patient
10 within two years following termination of therapy, or sexual misconduct that is
11 substantially related to the qualifications, functions or duties of a psychologist or
12 psychological assistant or registered psychologist.

13 (p) Functioning outside of his or her particular field or fields of competence as
14 established by his or her education, training, and experience.

15 (q) Willful failure to submit, on behalf of an applicant for licensure, verification
16 of supervised experience to the board.

17 (r) Repeated acts of negligence.

18 5. Section 2903 of the Code provides, in pertinent part, that no person may
19 engage in the practice of psychology or represent himself to be a psychologist without a license
20 granted under the Psychology Licensing Law (Chapter 6.6 of Division 2 of the Code).

21 6. Section 125.3 of the Code states, in pertinent part, that the Board may
22 request the administrative law judge to direct a licentiate found to have committed a violation or
23 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
24 and enforcement of the case.

25 7. Section 2964.6 of the Code states:

26 An administrative disciplinary decision that imposes terms of probation may
27 include, among other things, a requirement that the licensee who is being placed on probation
28 pay the monetary costs associated with monitoring the probation.

1 8. Section 2913 of the Code states:

2 A person other than a licensed psychologist may be employed by a licensed
3 psychologist, by a licensed physician and surgeon who is board certified in psychiatry by
4 the American Board of Psychiatry and Neurology, by a clinic which provides mental
5 health services under contract pursuant to Section 5614 of the Welfare and Institutions
6 Code, by a psychological corporation, by a licensed psychology clinic as defined in
7 Section 1204.1 of the Health and Safety Code, or by a medical corporation to perform
8 limited psychological functions provided that all of the following apply:

9 (a) The person is termed a "psychological assistant."

10 (b) The person (1) has completed a master's degree in psychology or
11 education with the field of specialization in psychology or counseling psychology,
12 or (2) has been admitted to candidacy for a doctoral degree in psychology or
13 education with the field of specialization in psychology or counseling psychology,
14 after having satisfactorily completed three or more years of postgraduate
15 education in psychology and having passed preliminary doctoral examinations, or
16 (3) has completed a doctoral degree which qualifies for licensure under Section
17 2914, in an accredited or approved university, college, or professional school
18 located in the United States or Canada.

19 (c) The person is at all times under the immediate supervision, as defined
20 in regulations adopted by the committee, of a licensed psychologist, or board
21 certified psychiatrist, who shall be responsible for insuring that the extent, kind,
22 and quality of the psychological services he or she performs are consistent with
23 his or her training and experience and be responsible for his or her compliance
24 with the provisions of this chapter and regulations duly adopted hereunder,
25 including those provisions set forth in Section 2960.

26 (d) The licensed psychologist, board certified psychiatrist, contract clinic,
27 psychological corporation, or medical corporation, has registered the
28 psychological assistant with the committee. The registration shall be renewed

1 annually in accordance with regulations adopted by the committee. No licensed
2 psychologist may register, employ, or supervise more than three psychological
3 assistants at any given time unless specifically authorized to do so by the
4 committee. No board certified psychiatrist may register, employ, or supervise
5 more than one psychological assistant at any given time. No contract clinic,
6 psychological corporation, or medical corporation may employ more than 10 such
7 assistants at any one time. No contract clinic may register, employ, or provide
8 supervision for more than one psychological assistant for each designated
9 full-time staff psychiatrist who is qualified and supervises the psychological
10 assistants. No psychological assistant may provide psychological services to the
11 public for a fee, monetary or otherwise, except as an employee of a licensed
12 psychologist, licensed physician, contract clinic, psychological corporation, or
13 medical corporation.

14 (e) The psychological assistant shall comply with regulations that the
15 committee may, from time to time, duly adopt relating to the fulfillment of
16 requirements in continuing education.

17 (f) No person shall practice as a psychological assistant who is found by
18 the committee to be in violation of the provisions of Section 2960 and the rules
19 and regulations duly adopted thereunder.

20 9. Section 2963 of the Code states:

21 A plea or verdict of guilty or a conviction following a plea of nolo contendere
22 made to a charge which is substantially related to the qualifications, functions and duties
23 of a psychologist or psychological assistant is deemed to be a conviction within the
24 meaning of this article. The committee may order the license suspended or revoked, or
25 may decline to issue a license when the time for appeal has elapsed, or the judgment of
26 conviction has been affirmed on appeal or when an order granting probation is made
27 suspending the imposition of sentence, irrespective of a subsequent order under the
28 provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his or

1 her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
2 dismissing the accusation, information or indictment.

3 10. Section 480 of the Code states:

4 "(a) A board may deny a license regulated by this code on the grounds that the
5 applicant has one of the following:

6 "(1) Been convicted of a crime. A conviction within the meaning of this section
7 means a plea or verdict of guilty or a conviction following a plea of nolo contendere.
8 Any action which a board is permitted to take following the establishment of a conviction
9 may be taken when the time for appeal has elapsed, or the judgment of conviction has
10 been affirmed on appeal, or when an order granting probation is made suspending the
11 imposition of sentence, irrespective of a subsequent order under the provisions of Section
12 1203.4 of the Penal Code.

13 "(2) Done any act involving dishonesty, fraud or deceit with the intent to
14 substantially benefit himself or another, or substantially injure another; or

15 "(3) Done any act which if done by a licentiate of the business or profession in
16 question, would be grounds for suspension or revocation of license.

17 "The board may deny a license pursuant to this subdivision only if the crime or
18 act is substantially related to the qualifications, functions or duties of the business or
19 profession for which application is made.

20 "(b) Notwithstanding any other provision of this code, no person shall be denied
21 a license solely on the basis that he has been convicted of a felony if he has obtained a
22 certificate of rehabilitation under Section 4852.01 and following of the Penal Code or that
23 he has been convicted of a misdemeanor if he has met all applicable requirements of the
24 criteria of rehabilitation developed by the board to evaluate the rehabilitation of a person
25 when considering the denial of a license under subdivision (a) of Section 482.

26 "(c) A board may deny a license regulated by this code on the ground that the
27 applicant knowingly made a false statement of fact required to be revealed in the
28 application for such license."

11. Title 16, California Code of Regulations, Section 1394, provides:

"For purposes of denial, suspension, or revocation of a license or registration pursuant to Division 1.5 (commencing with section 475) of the Code, a crime or act shall be considered substantially related to the qualifications, functions, or duties of a person holding a license or registration under the Psychology Licensing Law

FIRST CAUSE FOR DENIAL OF APPLICATION

(Conviction of a Crime)

12. Respondent's application is subject to denial under sections 2960(a) and 480(a)(1) of the Code in that on or about July 16, 1999, in a criminal proceeding entitled *People v. Simon Andrew Casey* in Orange County Superior Court, Case Number MB98SF0632, respondent was convicted by a plea of guilty of violations of Business and Professions Code Section 2903. The circumstances are as follows:

a. Between in or around 1993 and 1997, respondent provided services as a psychologist to several patients including Mr. J.B., Ms. L.B., Ms. J.G., Mr. G., Mr. J.O, Ms. S.O., Master Je.O. and Master Jo.O. Respondent provided these services at respondent's Psychoneurological Institute located at 25909 Pala Place, Suite 350, Mission Viejo, California 92691. To each patient, respondent falsely represented or otherwise held himself out as a psychologist. Respondent received payment for the psychological services either directly from the patients or from the patients' insurance companies.

b. On or about August 14, 1998, a ten (10) count criminal complaint was filed against respondent in the Superior Court of California, County of Orange, South Justice Center, in the case of *People v. Simon Andrew Casey*, Case Number MB98SF0632, charging respondent, among other things, with grand theft (Penal Code § 487.1), unlawful practice of psychology (Code § 2903), and filing a false and fraudulent claim for health care services (Penal Code § 550(A)(6)).

c. On or about April 22, 1999, respondent entered a guilty plea to one count of filing a false and fraudulent claim for health care services in violation of Penal

1 Code section 550(A)(6) (Count 4 of the Criminal Complaint), and to one count of
2 unlawful practice of psychology in violation of Code section 2903 (Count 2 of the
3 Criminal Complaint). As part of the plea agreement, Counts 1, 3, 5, 6, 7, 8, 9, and 10 of
4 the Criminal Complaint were dismissed. On June 24, 1999, the criminal court dismissed
5 Count 4 of the Criminal Complaint based on its finding that respondent had returned
6 \$36,000.00 in fees to former patients and insurance companies.

7 d. On or about July 16, 1999, in the Superior Court of California,
8 County of Orange, South Justice Center, in the case of *People v. Simon Andrew Casey*,
9 Case Number MB98SF0632, respondent was convicted on his guilty plea of one count of
10 unlawfully engaging in the practice of psychology in violation of Business and
11 Professions Code section 2903 (Count 2 of the Criminal Complaint).

12 e. On or about July 16, 1999, Respondent was sentenced as follows:
13 Imposition of sentence suspended; summary probation for three years under certain terms
14 and conditions including a \$200.00 fine and the requirement that respondent not own, use
15 or possess deadly weapons.

16 **SECOND CAUSE FOR DENIAL OF APPLICATION**

17 (Unlicensed Practice of Psychology)

18 13. Respondent's application is subject to denial under sections 2903 and
19 2960(k) of the Code in that he engaged in the unlawful practice of psychology. The
20 circumstances are as follows:

21 a. The facts and circumstances alleged in paragraph 12 above are
22 incorporated here as if fully set forth.

23 **THIRD CAUSE FOR DENIAL OF APPLICATION**

24 (Acts Involving Dishonesty, Fraud or Deceit)

25 14. Respondent's application is subject to denial under sections 2960(n) and/or
26 480(a)(2) of the Code in that respondent engaged in acts involving dishonesty, fraud or deceit
27 with intent to substantially benefit himself or substantially injure another. The circumstances
28 are as follows:

1 a. The facts and circumstances alleged in paragraph 12 above are
2 incorporated here as if fully set forth.
3

4 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

5 (Grounds for Discipline if Done by Licentiate)

6 15. Respondent's application is subject to denial under section 480(a)(3) of the
7 Code in that respondent engaged in acts which would subject a psychologist to discipline, which
8 acts were substantially related to the qualifications, functions, and duties of a psychologist under
9 Title 16, California Code of Regulations, section 1394. The circumstances are as follows:


10 a. The facts and circumstances alleged in paragraph 12 above are
11 incorporated here as if fully set forth.
12

13 **PRAYER**

14 WHEREFORE, Complainant requests that a hearing be held on the matters herein
15 alleged, and that following the hearing, the Board of Psychology issue a decision:

- 16 1. Denying the application of Simon Andrew Casey for a license as a
17 registered psychological assistant
18 2. Taking such other and further action as deemed necessary and proper.

19 DATED: February 8, 2002.

20 
21 THOMAS S. O'CONNOR
22 Executive Officer
23 Board of Psychology
24 Department of Consumer Affairs
25 State of California
26 Complainant
27
28

DECLARATION OF SERVICE BY CERTIFIED MAIL

In the Matter of the Statement of Issues Filed
Against:

Simon Andrew Casey

No. : X47

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1422 Howe Avenue, Ste. 22 Sacramento, California 95825. I served a true copy of the attached:

DECISION AND ORDER

by mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERT NO.

Simon Andrew Casey
1200 Vista Jardin
San Clemente, CA 92673

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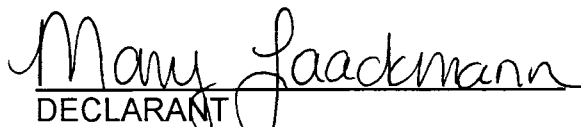
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Each said envelope was then on, April 10, 2003, sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, as certified mail, with the postage thereon fully prepaid, and return receipt requested.

Executed on, April 10, 2003, at Sacramento, California.
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


DECLARANT
Mary Laackmann
Enforcement Analyst